

EXHIBIT L

From: [Kazim Naqvi](#)
To: ["Amy Craig"](#)
Cc: [Rena Andoh](#)
Subject: RE: Call
Date: Monday, September 26, 2022 2:01:39 PM

Amy:

We are disappointed to receive across-the-board objections and a refusal to produce any responsive documents.

The Court's order at ECF 205, which is cited throughout the objections, referred to the Court's deferral of discovery and other ***motions*** except those related to Skyrise's Interrogatory No. 1. The Court did not rule that all discovery is stayed until issues related to Skyrise's Interrogatory No. 1 are resolved. Even if it did, the requested discovery from Mr. Baptist is relevant to and necessary for Moog to make a fulsome identification of the trade secrets that have been misappropriated and used by Skyrise in this case (the information requested by Skyrise's Interrogatory No. 1). The only reason Moog subpoenaed Mr. Baptist is because Skyrise took the position that personal electronic devices used for work purposes are not in Skyrise's possession, custody or control, so the Court is well aware that Moog would be issuing subpoenas in connection with its trade secret identification requirement.

In fact, the Court's order which implemented a temporary discovery stay (ECF 216) provides in relevant part: "The pending discovery deadlines are held in abeyance until the individual defendants' motion to stay [214] is resolved." As you know, the motions to stay have now been denied, and therefore resolved. The stay of discovery deadlines is lifted.

Please provide your availability to meet and confer on Wednesday or Thursday afternoon of this week. While we would prefer not to burden the Court with third party discovery issues, if we cannot reach a resolution, we will be forced to raise the issue with the Court.

Thank you,
Kazim

Kazim Naqvi
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From: Amy Craig <amy@ramsey-ehrllich.com>
Sent: Friday, September 23, 2022 3:57 PM
To: Kazim Naqvi <KNaqvi@sheppardmullin.com>
Cc: Rena Andoh <RAndoh@sheppardmullin.com>
Subject: Re: Call

Hi Kazim -

I have now had an opportunity to review the docket in this matter. My understanding from the Court's orders is that discovery of third parties, such as Mr. Baptist, has not yet been authorized. I would be happy to meet and confer if you believe my understanding of the Court's orders is incorrect. In the meantime, I am attaching here Mr. Baptist's responses and objections to the Subpoena you served on August 9, 2022.

Have a nice weekend,

Amy

Amy Craig
Ramsey | Ehrlich LLP
Cell: (415) 215-7087
amy@ramsey-ehrlich.com

On Thu, Sep 8, 2022 at 5:38 PM Amy Craig <amy@ramsey-ehrlich.com> wrote:

Hi Kazim -

Thanks for letting me know. I'm about to leave for the day to take my son to an Imagine Dragons concert for his 10th birthday. But will revisit the subpoena tomorrow and get back to you.

Best,

Amy

Amy Craig
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Cell: (415) 215-7087
amy@ramsey-ehrlich.com

On Thu, Sep 8, 2022 at 2:35 PM Kazim Naqvi <KNaqvi@sheppardmullin.com> wrote:

Hi Amy:

The Court issued today the attached order denying Defendants' motions to stay.

Can you please provide a date certain by which you will respond to Moog's subpoena to Mr. Baptist?

Thank you,
Kazim

Kazim Naqvi

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From: Amy Craig <amy@ramsey-ehrllich.com>
Sent: Thursday, August 11, 2022 3:11 PM
To: Rena Andoh <RAndoh@sheppardmullin.com>
Cc: Kazim Naqvi <KNaqvi@sheppardmullin.com>
Subject: Re: Call

Rena -

Thank you for sending the subpoena. I understand from the docket that discovery is currently stayed in this matter. Please let us know when the discovery stay has been lifted and we can discuss a response date.

Best,

Amy
Amy Craig
Ramsey | Ehrlich LLP
Cell: (415) 215-7087
amy@ramsey-ehrllich.com

On Tue, Aug 9, 2022 at 9:13 AM Rena Andoh <RAndoh@sheppardmullin.com> wrote:

Amy,

Just following up. We do need to proceed with serving the subpoena, so it is attached – thank you again for agreeing to accept service on behalf of Mr. Baptist. We would still appreciate understanding Mr. Baptist’s current employment status vs an vis Skyrise to the extent that it impacts his representation in this action going forward.

Please let us know if you would like to discuss the subpoena once you’ve had a chance to review.

Regards,
Rena

Rena Andoh
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From: Rena Andoh
Sent: Wednesday, August 3, 2022 1:06 PM
To: 'Amy Craig' <amy@ramsey-ehrllich.com>
Subject: RE: Call

Amy,

Thanks again for speaking with me on Monday. I just wanted to follow up and confirm Mr. Baptist's current relationship to Skyrse and whether Latham will be continuing to represent him in the civil case except with respect to his personal electronic devices.

Regards,
Rena

Rena Andoh
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From: Amy Craig <amy@ramsey-ehrllich.com>
Sent: Friday, July 29, 2022 1:48 PM
To: Rena Andoh <RAndoh@sheppardmullin.com>
Subject: Re: Call

Will do!

Have a great weekend,

Amy

On Fri, Jul 29, 2022 at 10:45 AM Rena Andoh <RAndoh@sheppardmullin.com> wrote:

Great – if you can please call my cell (646-263-4220), I'll be working remotely on Monday. Look forward to speaking with you then.

Rena Andoh
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From: Amy Craig <amy@ramsey-ehrllich.com>
Sent: Friday, July 29, 2022 1:29 PM
To: Rena Andoh <RAndoh@sheppardmullin.com>
Subject: Re: Call

11:30-12 PT is open! I can plan to call you then if that works.

On Fri, Jul 29, 2022 at 10:18 AM Rena Andoh <RAndoh@sheppardmullin.com> wrote:

Amy,

Thanks very much for reaching out – Monday works well for me. Any chance you have an opening between 10-12PT Monday to connect?

Regards,
Rena

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From: Amy Craig <amy@ramsey-ehrllich.com>
Sent: Friday, July 29, 2022 10:12 AM
To: Rena Andoh <RAndoh@sheppardmullin.com>
Subject: Call

Hi Rena -

I received your voicemail. Sorry about the phone tag! I am flat out today - have a hearing on two motions to dismiss and a sentencing memo to file. (Post-vacation fun!) I free up on Monday -- happy to connect at a time that works for you.

Happy Friday,

Amy

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